

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

**PURDUE PHARMA L.P., et al.,

Debtors.¹**

Chapter 11

Case No. 19-23649 (RDD)

(Jointly Administered)

**SECOND SUPPLEMENTAL DECLARATION OF GREGORY G. GARRE
IN SUPPORT OF APPLICATION OF DEBTORS FOR AUTHORITY TO
RETAIN AND EMPLOY LATHAM & WATKINS LLP AS SPECIAL COUNSEL
TO THE DEBTORS EFFECTIVE AS OF JANUARY 13, 2022**

I, Gregory G. Garre, declare as follows:

1. I am a partner in the law firm of Latham & Watkins LLP (“L&W”), an international law firm with offices across the United States, Europe, and Asia. I am admitted in, practicing in, and a member in good standing of the bar of the District of Columbia, and there are no disciplinary proceedings pending against me. I am over the age of eighteen, am authorized to submit this Declaration, and am competent to testify on the matters contained herein.

2. On April 1, 2022, the Debtors filed an application to retain and employ L&W as special counsel to the Debtors [D.I. 4627] (the “Application”).² My declaration in support of the Application (the “Initial Declaration”) was attached to the Application as Exhibit B. On April 18, 2022, the Court entered the *Order Authorizing the Retention and Employment of Latham &*

¹ The Debtors in these cases, along with the last four digits of each Debtor’s registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors’ corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

² Capitalized terms used but not defined herein have the meanings ascribed to them in the Application.

Watkins LLP as Special Counsel to the Debtors Effective as of January 13, 2022 [D.I. 4670] (the “Retention Order”). On May 19, 2023, the Debtors filed a supplemental application to retain and employ L&W as special counsel to the Debtors [D.I. 5616] (the “Supplemental Application”). On June 20, 2023, the Court entered the *Order Authorizing Debtors to Supplement Retention and Employment of Latham & Watkins LLP as Special Counsel to the Debtors Effective as of April 14, 2023* [D.I. 5736] (the “Supplemental Retention Order”).

3. On December 15, 2022, I submitted a supplemental declaration [D.I. 5299] (the “Supplemental Declaration”) providing disclosures in order to provide notice of changes to L&W’s hourly rates during the Chapter 11 Cases. I submit this second supplemental declaration in connection with the Application to provide additional disclosures in accordance with Bankruptcy Rules 2014(a) and 2016(b) and the Retention Order, which requires L&W to provide notice of changes to its hourly rates during the Chapter 11 Cases.

4. In the Initial Declaration, I disclosed L&W’s hourly rates in effect at that time for the L&W Services. In the Initial Declaration and the Supplemental Declaration, I disclosed that the hourly rates are subject to periodic adjustments. As such, in the ordinary course of L&W’s business and in keeping with L&W’s established billing practices and procedures, L&W’s standard billing rates will be adjusted firm-wide on January 1, 2024. Specifically, effective January 1, 2024, L&W’s hourly rates for professionals and paraprofessionals who may provide services to the Debtors will range as follows:

Billing Category	Range
Partners	\$1,495 to \$2,455
Counsel	\$1,430 to \$1,860
Associates	\$760 to \$1,505
Professional Staff	\$230 to \$1,130
Paralegals	\$325 to \$710

5. As disclosed in the Initial Declaration, L&W has agreed to a 10% discount on its standard hourly rates and will apply such discount to the rates listed above.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my information, knowledge, and belief.

Executed on this 13th day of December, 2023.

/s/ Gregory G. Garre
Gregory G. Garre